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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

JEFFREY R. PETERSON,
Plaintiff,

v.

ACUMED LLC, a Delaware Corporation,
Defendant.

No. CV 10-586-HU

PLAINTIFF'S PROPOSED
VOIR DIRE QUESTIONS

The plaintiff submits the following proposed voir dire questions.

1. Have you, or a close family member or friend, ever been self-employed or been the owner of a business?
2. Do you or any close family member have an ownership interest in any business or organization which has been sued by one of its employees?
3. Have you or a close family or friend ever worked as a manager or a supervisor?
4. Have you or a close family or friend ever been an executive, a manager or a supervisor in a company?

5. Have you or a close family worked for a company that had the practice of paying severance pay to employees whose employment was terminated.?
6. If you worked at a company that had the practice of paying severance, how did the severance pay policy work? What are your expectations regarding a company's obligation to pay severance to its employees?
7. Have you or a close family or friend ever worked in a human resources' office?
8. Have you ever been trained in human resources procedures or personnel matters?
9. Have you, or a close family member or friend, been employed in a job where you had responsibility for hiring and firing?
10. Have you ever fired someone from their job? What were the circumstances?
11. Have you ever been involved in a lawsuit either as a plaintiff or a defendant?
12. Have you ever been a witness in a lawsuit?
13. Have you previously served on a jury?
14. Is there any reason, why, if you were the plaintiff or defendant, you wouldn't want someone with your state of mind to serve as a juror in this case?

Dated: 11 July, 2011

/s/ Paul L. Breed
Paul L. Breed, OSB No. 83161
Of Attorneys for Plaintiff